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Attorneys for Defendants
Robert Gomez, Gomez & Associates, Inc.
and Rock'n Rob Enterprises

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PCPLV LLC d/b/a Pinnacle.
Compounding Pharmacy, Ofir Ventura,
Cecilia Ventura, Brandon Jimenez, Robert
Gomez, Gomez & Associates, Inc., Rock'n
Rob Enterprises, Amir Shalev, D.P.M., AS
Enterprises, Inc., and Ivan Lee Goldsmith,
M.D.
Defendants.

Case no.: 2:21-cv-00184-JCM-DJA

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT

(First Request)

STIPULATION AND ~~PROPOSED~~ ORDER TO
EXTEND TIME TO RESPOND TO COMPLAINT

Plaintiff, the United States of America, and Defendants Robert Gomez, Gomez & Associates, Inc., and Rock'n Rob Enterprises ("Defendants") stipulate to extend the time by which Defendants may respond to the Complaint in this action by 14 days from February 13, 2024 to February 27, 2024, and in support thereof, say:

1. Plaintiff filed their Complaint in this action on February 2, 2021.

2. Defendant, Robert Gomez was served with the Complaint in this on or about January 23, 2024.

3. There is good cause to extend the time by which Defendants may respond to the Complaint in this action because counsel for Defendants are 1) hoping for a resolution; and 2) were only recently retained by Defendants in relation to this action and require additional time to

investigate facts and circumstances pleaded in the Complaint prior to filing Defendants' responses.

4. Based upon Defendants' request, the Parties have agreed to extend the deadline by which Defendants may respond to the Complaint by 14 days from February 13, 2024 to February 27, 2024, subject to the Court's approval.

5. Defendants have not previously requested an extension of the deadline to respond to the Complaint.

IT IS SO STIPULATED

Dated this 7th day of February, 2024.

Christian Ruiz
U.S. Attorney's Office

/s/ Christian Ruiz

CHRISTIAN RUIZ
United States of America Assistant
Attorney

Dated this 7th day of February, 2024.

David T. Brown
Brown, Brown & Premsrirut

/s/ David T. Brown

DAVID T. BROWN
Counsel for Defendants

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

Dated: 2/8/2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/EMF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/EMF.

/s/ Alexis Budner

ALEXIS BUDNER